

**DECISION
AND
FINDING OF NO SIGNIFICANT IMPACT**

**ENVIRONMENTAL ASSESSMENT: MAMMAL DAMAGE
MANAGEMENT IN PENNSYLVANIA**

The United States Department of Agriculture (USDA), Animal and Plant Health Inspection Service (APHIS), Wildlife Services (WS) program completed an Environmental Assessment (EA) on alternatives for the protection of agricultural resources, natural resources, property, livestock, and public health and safety from damage and risks associated with mammals in Pennsylvania (USDA 2014). The EA documents the need for action and assesses potential impacts on the human environment of four alternatives to address that need.

PUBLIC COMMENTS

The EA was made available for review and comment from January 20 to February 21, 2014 through a Notice of Availability (NOA) published in the *The Patriot News* and sent to interested parties through the APHIS stakeholder registry via GovDelivery. WS also published this EA on the program website. No comments were received. All correspondence on the EA is maintained at the WS State Office, USDA APHIS Wildlife Services, P.O. Box 60827, Harrisburg, PA, 17106-0827.

ISSUES ASSOCIATED WITH MAMMAL DAMAGE MANAGEMENT ACTIVITIES

The EA analyzed a range of management alternatives in context of issues relevant to the scope of the analysis including:

- Effects on target mammal species
- Effects on other wildlife species, including Threatened and Endangered species
- Effects on human health and safety
- Impacts to stakeholders, including aesthetics
- Humaneness and animal welfare concerns of methods used

AFFECTED ENVIRONMENT

Mammal damage or threats of damage can occur statewide in Pennsylvania wherever those mammal species occur. However, mammal damage management would only be conducted by WS when requested by a landowner or manager and only on properties where a cooperative service agreement or other comparable document was signed between WS and a cooperating entity. Upon receiving a request for assistance, activities could be conducted on federal, state, tribal, municipal, and private properties. Areas where damage or threats of damage could occur include, but would not be limited to agricultural fields, vineyards, orchards, farms, aquaculture facilities, grain mills, grain handling areas, railroad yards, waste handling facilities, industrial sites, natural resource areas, park lands, and historic sites; state and interstate highways and roads; property in or adjacent to subdivisions, businesses, and industrial parks; timberlands, croplands, and pastures; private and public property where burrowing mammals cause damage to structures, dikes, ditches, ponds, and levees; public and private properties in rural/urban/suburban areas where mammals cause damage to landscaping and natural resources, property, and are a threat to human safety through the spread of disease. The areas could also include airports and military airbases where mammals are a threat to human safety and to property; and areas where mammals negatively affect wildlife, including T&E species.

DESCRIPTION OF THE ALTERNATIVES

The following four alternatives were developed to respond to the issues identified in Chapter 2 of the EA (USDA 2014). A detailed discussion of the effects of the alternatives on the issues is described in the EA under Chapter 4; below is a summary of the alternatives.

Alternative 1: Technical Assistance Only

This alternative would not allow for WS operational mammal damage management (MDM) in Pennsylvania. WS would only provide technical assistance and make recommendations when requested. Producers, property owners, agency personnel, corporations, or others could conduct MDM using any legal lethal or non-lethal method available to them.

Alternative 2: Integrated Mammal Damage Management Program (Proposed Action/No Action)

The proposed action is to continue the current damage management program that responds to mammal damage in Pennsylvania. WS involvement in MDM is closely coordinated with the PGC, and WS take of mammals is authorized through permits and/or other authorities granted by the PGC. An integrated wildlife damage management (IWDM) approach would be implemented to reduce mammal damage to property, agricultural resources, and natural resources, and to reduce mammal impacts on human/public health and safety. Damage management would be conducted on public and private property when the resource owner (property owner) or manager requests assistance. The IWDM strategy would encompass the use and recommendation of practical and effective methods of preventing or reducing damage while minimizing harmful effects of damage management measures on humans, target and non-target species, and the environment. Under this action, WS could provide technical assistance and direct operational damage management, including non-lethal and lethal management methods by applying the WS Decision Model (Slate et al. 1992). When appropriate, non-lethal techniques like physical exclusion, habitat modification or harassment would be recommended and utilized to reduce damage. In other situations, mammals would be removed as humanely as possible using shooting, trapping, and registered pesticides and other products. In determining the damage management strategy, preference would be given to practical and effective non-lethal methods, unless prohibited by law. However, non-lethal methods may not always be applied as a first response to each damage problem. The most appropriate response could often be a combination of non-lethal and lethal methods, or could include instances where application of lethal methods alone would be the most appropriate strategy.

Alternative 3: Non-lethal Mammal Damage Management Only by WS

This alternative would require WS to only use and recommend non-lethal methods to resolve mammal damage problems. Information on lethal MDM methods would still be available to producers and property owners through other sources such as the PGC, USDA Agricultural Extension Service offices, universities, or pest control organizations. Requests for information regarding lethal management approaches would be referred to these entities. Individuals might choose to implement WS non-lethal recommendations, implement lethal methods or other methods not recommended by WS, contract for WS direct assistance with non-lethal MDM, use contractual services of private businesses, or take no action. Persons receiving WS's non-lethal technical and direct control assistance could still resort to lethal methods that were available to them.

Alternative 4: No Federal WS Mammal Damage Management

This alternative would eliminate WS involvement in MDM in Pennsylvania. WS would not provide direct operational or technical assistance and requesters of WS's assistance would have to conduct their own MDM without WS input. Information on MDM methods would still be available to producers and property owners through other sources such as the PGC, USDA Agricultural Extension Service offices, universities, or pest control organizations. Requests for information would be referred to these entities. Individuals might choose to conduct MDM themselves, use contractual services of private businesses, or take no action.

CONSISTENCY

Wildlife damage management activities conducted in Pennsylvania are consistent with work plans, MOU's, and policies of WS, the PGC, and the US Fish and Wildlife Service (USFWS). WS completed a Section 7 Consultation with the USFWS for MDM activities. The USFWS concurred with WS' determinations. WS also consulted with the PGC, the Pennsylvania Department of Natural Resources (PADCNR), and the Pennsylvania Fish and Boat Commission (PAFBC) regarding potential risks to state-listed species proposed in the EA. The PGC, PADCNR, and PAFBC concurred with WS' determination that the proposed action would not adversely impact populations of state-listed species.

MONITORING

The Pennsylvania WS program will annually review its effects on target mammal species and other species addressed in the EA to ensure those activities do not impact the viability of wildlife species. In addition, the EA will be reviewed each year to ensure that the analyses are sufficient.

CUMULATIVE IMPACTS OF THE PROPOSED ACTION

No significant cumulative environmental impacts were identified from any of the four alternatives, including the proposed action. Under the proposed action, the lethal removal of mammals by WS would not have significant impacts on statewide mammal populations when known sources of mortality were considered. No risk to public safety was identified when activities were provided and expected by requesting individuals under Alternative 2 and Alternative 3 since only trained and experienced personnel would conduct and/or recommend damage management activities. There would be a slight increased risk to public safety when persons who reject assistance and recommendations conduct their own activities under Alternative 1 and when no assistance was provided under Alternative 4. However, under all of the alternatives, those risks would not be to the point that the effects would be significant. The analysis in the EA indicates that an integrated approach to managing damage and threats caused by mammals would not result in significant cumulative effects on the quality of the human environment.

DECISION AND FINDING OF NO SIGNIFICANT IMPACT

I have carefully reviewed the EA prepared for this proposal and the input from the public involvement process. I find the proposed action alternative (Alternative 2) to be environmentally acceptable, addressing the issues and needs while balancing the environmental concerns of management agencies, landowners, advocacy groups, and the public. The analysis in the EA adequately addresses the identified issues, which reasonably confirm that no significant impact, individually or cumulatively, to the quality of the human environment are likely to occur from the proposed action, nor does the proposed action constitute a major federal action. Therefore, the analysis in the EA does not warrant the completion of an EIS.

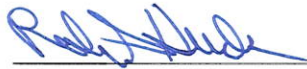
Based on the analyses in the EA, the need for action and the issues identified are best addressed by selecting Alternative 2 and applying the associated standard operating procedures. Alternative 2 successfully addresses (1) mammal damage management using a combination of the most effective methods and does not adversely impact the environment, property, human health and safety, target species, and/or non-target species, including T&E species; (2) it offers the greatest chance of maximizing effectiveness and benefits to resource owners and managers; (3) it presents the greatest chance of maximizing net benefits while minimizing adverse effects to public health and safety; and (4) it offers a balanced approach to the issues of humaneness and aesthetics when all facets of those issues are considered. Further analysis would be triggered if changes occur that broaden the scope of damage management activities that affect the natural or human environment or from the issuance of new environmental regulations. Therefore, it is my decision to implement the proposed action/no action alternative (Alternative 2) as described in the EA.

Based on the analyses provided in the EA, there are no indications that the proposed action (Alternative 2) would have a significant impact, individually or cumulatively, on the quality of the human environment. I agree with this conclusion and therefore, find that an EIS should not be prepared. This determination is based on the following factors:

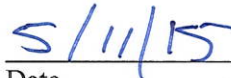
1. Mammal damage management, as conducted by WS in the state, is not regional or national in scope.
2. The proposed action would pose minimal risk to public health and safety. Based on the analyses in the EA, the methods available would not adversely affect human safety based on their use patterns and standard operating procedures.
3. There are no unique characteristics such as park lands, prime farm lands, wetlands, wild and scenic areas, or ecologically critical areas that would be significantly affected. WS' standard operating procedures and adherence to applicable laws and regulations would further ensure that WS' activities do not harm the environment.
4. The effects on the quality of the human environment are not highly controversial. Although there is some opposition to mammal damage management, this action is not highly controversial in terms of size, nature, or effect.
5. Based on the analysis documented in the EA and the accompanying administrative file, the effects of the proposed damage management program on the human environment would not be significant. The effects of the proposed activities are not highly uncertain and do not involve unique or unknown risks.
6. The proposed action would not establish a precedent for any future action with significant effects.
7. No significant cumulative effects were identified through the assessment. The EA analyzed cumulative effects on target and non-target species populations and concluded that such impacts were not significant for this or other anticipated actions to be implemented or planned within Pennsylvania.
8. The proposed activities would not affect districts, sites, highways, structures, or objects listed in or eligible for listing in the National Register of Historic Places, nor would they likely cause any loss or destruction of significant scientific, cultural, or historical resources.

9. WS conducted a Section 7 Consultation to evaluate impacts to T&E species, and the USFWS concurred with WS' determinations.
10. The proposed action would comply with all applicable federal, state, and local laws.
11. No significant cumulative effects were identified by this assessment or other actions implemented or planned within the area.

The rationale for this decision is based on several considerations. This decision takes into account public comments, social/political and economic concerns, public health and safety, and the best available science. The foremost considerations are that: 1) mammal damage management would only be conducted by WS at the request of landowners/managers, 2) management actions would be consistent with applicable laws, regulations, policies and orders, and 3) no significant effects to the environment were identified in the analysis. As a part of this Decision, the WS program in Pennsylvania would continue to provide effective and practical technical assistance and direct management techniques that reduce damage and threats of damage.



Robert Hudson, Acting Director-Eastern Region
USDA/APHIS/WS
Raleigh, North Carolina



Date

APPENDIX A
LITERATURE CITED

- Slate, D.A., R. Owens, G. Connolly, and G. Simmons. 1992. Decision making for wildlife damage management. *Trans. N. A. Wildl. Nat. Res. Conf* 57:51-62.
- USDA (U.S. Department of Agriculture). 2014. Environmental Assessment: Mammal Damage Management in Pennsylvania. USDA, APHIS, WS, Harrisburg, PA.